

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

ROBERT HOLMAN,

*Plaintiff,*

v.

THOMAS J. VILSACK, in his official capacity as  
Secretary of the United States Department of  
Agriculture, et al.,

*Defendants.*

No. 1:21-cv-01085-STA-jay

**NOTICE OF CONSULTATION HELD BETWEEN THE NATIONAL BLACK  
FARMERS ASSOCIATION AND THE ASSOCIATION OF AMERICAN INDIAN  
FARMERS WITH PLAINTIFF AND DEFENDANTS REGARDING CONDITIONAL  
MOTION TO INTERVENE AS DEFENDANTS**

The National Black Farmers Association (NBFA) and the Association of American Indian Farmers (AAIF) submit this Notice to clarify for the Court that, after conferring with Plaintiff's and Defendants' counsel, there is no dispute between the parties regarding the process to address the Conditional Motion for Leave to Intervene as Defendants filed by NBFA and AAIF on June 24, 2021. (Dkt. No. 27.)

On July 7, 2021, Plaintiff filed a response to the Conditional Motion that requested an orderly process to address the Conditional Motion. (Dkt. No. 39.)

On July 8, 2021, counsel for NBFA and AAIF (the undersigned) consulted with Plaintiff's counsel by telephone regarding their positions on the Conditional Motion and agreed that there was no dispute regarding the process to address the Conditional Motion.

Accordingly, NBFA and AAIF have submitted to the Court's ECF mailbox a Proposed Order regarding a process for addressing the Conditional Motion. Both Plaintiff's and Defendants' counsel have stated by email that they do not object to the Proposed Order.

Dated: July 9, 2021

Respectfully submitted,

**PUBLIC JUSTICE, P.C.**

/s/ Randolph T. Chen

Randolph T. Chen (D.C. Bar No. 1032644)

David Muraskin (D.C. Bar No. 1012451)

1620 L Street NW, Suite 630

Washington, D.C. 20036

Telephone: (202) 797-8600

Facsimile: (202) 232-7203

dmuraskin@publicjustice.net

rchen@publicjustice.net

*Counsel for the National Black Farmers  
Association and the Association of American  
Indian Farmers*